



The Chemical Company

SFUND RECORDS CTR

2157375

May 20, 2008

VIA FEDERAL EXPRESS #7927 0245 6680

Linda Ketellapper, SFD-7-5
U.S.E.P.A., Region IX
Superfund Division
75 Hawthorne Street
San Francisco, California 94105

Re: 104 (e) Request for Information - Omega Superfund Site
Real Property at 8921 Dice Road, Santa Fe Springs, CA

Ms. Ketellapper:

Enclosed please find BASF Corporation's response to the above referenced Request for Information.

If you have any questions regarding these responses, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Caroline S. Hudson".

Caroline S. Hudson
Superfund Paralegal

Enclosures

cc: Nan Bernardo, Esq. (w/o enc.)

BASF Corporation
100 Campus Drive
Florham Park N.J. 07932
Tel: 973.245-6052
Fax: 973-245-6712
Caroline.hudson@basf.com

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**BASF Corporation's Responses to EPA Region 9
104(e) Request for Information - Omega Superfund Site
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Preliminary Statement

Corporate History

On October 12, 1894, the Michigan Alkali Company (MI) was incorporated. On December 30, 1942 Michigan Alkali Company consolidated with J. B. Ford Company and became Wyandotte Chemicals Corporation (MI).

BASF Corporation (NY) was incorporated on June 1, 1957. On November 4, 1969 BASF AG acquired 98.5% of the stock of Wyandotte Chemicals Corporation. As of July 9, 1970 Wyandotte Chemicals Corporation became a wholly owned subsidiary of BASF Overzee N.V. On December 31, 1970, BASF Corporation (NY) merged into Wyandotte Chemicals Corporation. Simultaneous with the merger, Wyandotte Chemicals changed its name to BASF Wyandotte Corporation (MI).

In 1973, BASF Wyandotte Corporation was purchased by Luchem Corporation. Luchem name was changed to BASF America Corporation in 1978. In 1985, BASF America Corporation acquired Inmont Corporation from United Technologies Corporation. On December 31, 1985, BASF Wyandotte Corporation (MI), and four sister corporations, Glasurit America Inc., BASF Color Systems Corporation, Limbacher Paint & Color Works, Inc. and Badische Corporation were merged with and into Inmont Corporation and, simultaneously changed its name to BASF Corporation.

8921 Dice Road in Santa Fe Springs, California (the "Property")

On June 9, 1950 Wyandotte Chemicals Corporation purchased certain assets of Pacific Chemicals Company, a division of American Marietta Co. These assets, which included the plant on 8921 Dice Road in Santa Fe Springs, California (the "Property") became part of the Chemical Specialties Business, of the J.B. Ford Division of Wyandotte Chemicals Corporation.

On April 1, 1980 Molson Companies Limited, through a subsidiary, acquired the Chemicals Specialties Business of BASF Wyandotte Corporation, and operated under the name of Diversey Wyandotte Corporation. As such, BASF has had no involvement with the Property or its business operations for almost 30 years. It is assumed that the historic operating information and documentation was left at the Property when the business was sold.

A Plot Plan of the Property dated 3/21/63 with an aerial photograph of the Property is numbered BASF Dice Road 001 to 002 and attached as Exhibit A. A second Plot Plan dated 8/31/79 is numbered BASF Dice Road 003 and attached as Exhibit B.

During its thorough investigation BASF discovered that documents, as defined in "Definitions" specifically relating to the Property were very limited. BASF is producing the relevant documents.

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BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

ENCLOSURE B: QUESTIONS

1. State the full legal name, address, telephone number, position(s) held by and tenure of the individual(s) answering any of these questions on behalf of BASF Corporation and/or any of its predecessor or related entities including, but not limited to, BASF Wyandotte Corporation (f/k/a Wyandotte Chemicals Corporation), concerning the facility located at 8921 Dice Road, Santa Fe Springs, CA (the "Property"). This Information Request is not limited to BASF Wyandotte Corporation (f/k/a Wyandotte Chemicals Corporation), rather, it governs operations of any and all of BASF Corporation's related entities (i.e., subsidiaries) and names (i.e., fictitious business names, etc.) at the Property, regardless of the relationship or association between BASF and any other such name or entity.

Response to 1.

Caroline S. Hudson
Sr. Legal Assistant
BASF Corporation
100 Campus Drive
Florham Park, NJ 07932
973/245-6052

BASF conducted a thorough internal investigation for any and all documents, as that term is defined in the Definitions section of this Request for Information. The investigation for documents related to the Property expanded beyond BASF Wyandotte Corporation, to include, Wyandotte Chemicals Corporation and any and all of BASF Corporation's related entities (collectively "BASF") at the Property, regardless of the relationship or association between BASF and any other such name or entity.

2. Provide any and all information on the use or generation of trichloroethane (TCA) in any form, and during any period of time, at the Property. Provide all relevant documentation concerning such use.

Response to 2.

During its internal investigation BASF did not discover any documents specifically related to the use or generation of trichloroethane (TCA) in any form, and during any period of time, at the Property.

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BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

3. Provide any and all information on the use or generation of 1,4 dioxane in any form, and during any period of time, at the Property. Provide all relevant documentation concerning such use.

Response to 3.

During its internal investigation BASF did not discover any documents specifically related to the use or generation of 1,4 dioxane in any form, and during any period of time, at the Property. .

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

4. Provide any and all information on the use or generation of trichloroethylene (TCE) in any form, and during any period of time, at the Property. Provide all relevant documentation concerning such use.

Response to 4.

During its internal investigation BASF did not discover any documents specifically related to the use or generation of trichloroethylene in any form, and during any period of time, at the Property. .

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

5. Provide any and all soil or groundwater investigation reports or results that were generated for the Property.

Response to 5.

During its internal investigation BASF did not discover any documents in its sole possession that are specifically related to the soil or groundwater reports or results that were generated for the Property. EPA produced as nexus information a copy of the December 1989 Groundwater Assessment and Vapor Extraction Feasibility Study

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of the Diversey Wyandotte Corporation in Santa Fe Springs, California prepared for Diversey Wyandotte Corporation by Thorne Environmental, Inc.

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

6. Provide any and all hazardous waste manifests, California liquid waste hauler records and/or any other record of disposal of any hazardous or liquid waste which in any way relates to the Property or your operations at the Property.

Response to 6.

During its internal investigation BASF did not discover any hazardous waste manifests, California liquid waste hauler records and/or any other record of disposal of any hazardous or liquid waste which in any way relates to the Property or your operations at the Property.

BASF is producing a relevant portion of a memo dated 3/31/93 from Ken Koneval, BASF Environmental Department entitled "Superfund." (numbered BASF Dice Road 004 to 006 and attached as Exhibit C) The internal information that was formally submitted to EPA is numbered BASF Dice Road 007 and is attached as Exhibit D.

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

7. Provide copies of all information and documentation related to approval of any remediation or cleanup activities conducted during your ownership or operations at the Property.

Response to 7.

During its internal investigation BASF did not discover any information or documentation related to approval of any remediation or cleanup activities conducted during your ownership or operations at the Property.

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

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8. Provide copies of all hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county and/or state agencies for the Property.

Response to 8.

During its internal investigation BASF did not discover any hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county and/or state agencies for the Property.

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

9. Provide a list of employees who had knowledge of the use and disposal of hazardous substances at the Property during the entire time period that BASF Corporation, or any of its predecessors, successors, subsidiaries, affiliates, contractors, trustees, assigns or agents, was associated with this facility. For each employee listed, provide the following information:
- a. The employee's full name;
 - b. The employee's current or last known address(es) and telephone number(s), including the last known date on which you believe each address and telephone number was current;
 - c. The employee's Social Security Number;
 - d. Identify the entire time period that the employee worked at the facility; and
 - e. The position(s) the employee held with each business entity during his or her entire period of employment at the facility and the year or years that the employee held each listed position.

Response to 9.a. through 9.e.

During its internal investigation BASF did not discover a list of employees who had knowledge of the use and disposal of hazardous substances at the Property during the entire time period that BASF Corporation, or any of its predecessors, successors,

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subsidiaries, affiliates, contractors, trustees, assigns or agents, was associated with this facility.

BASF recognizes it has a continuing obligation to provide all relevant information. BASF is continuing its internal investigation, and will supplement these responses, if additional information becomes available.

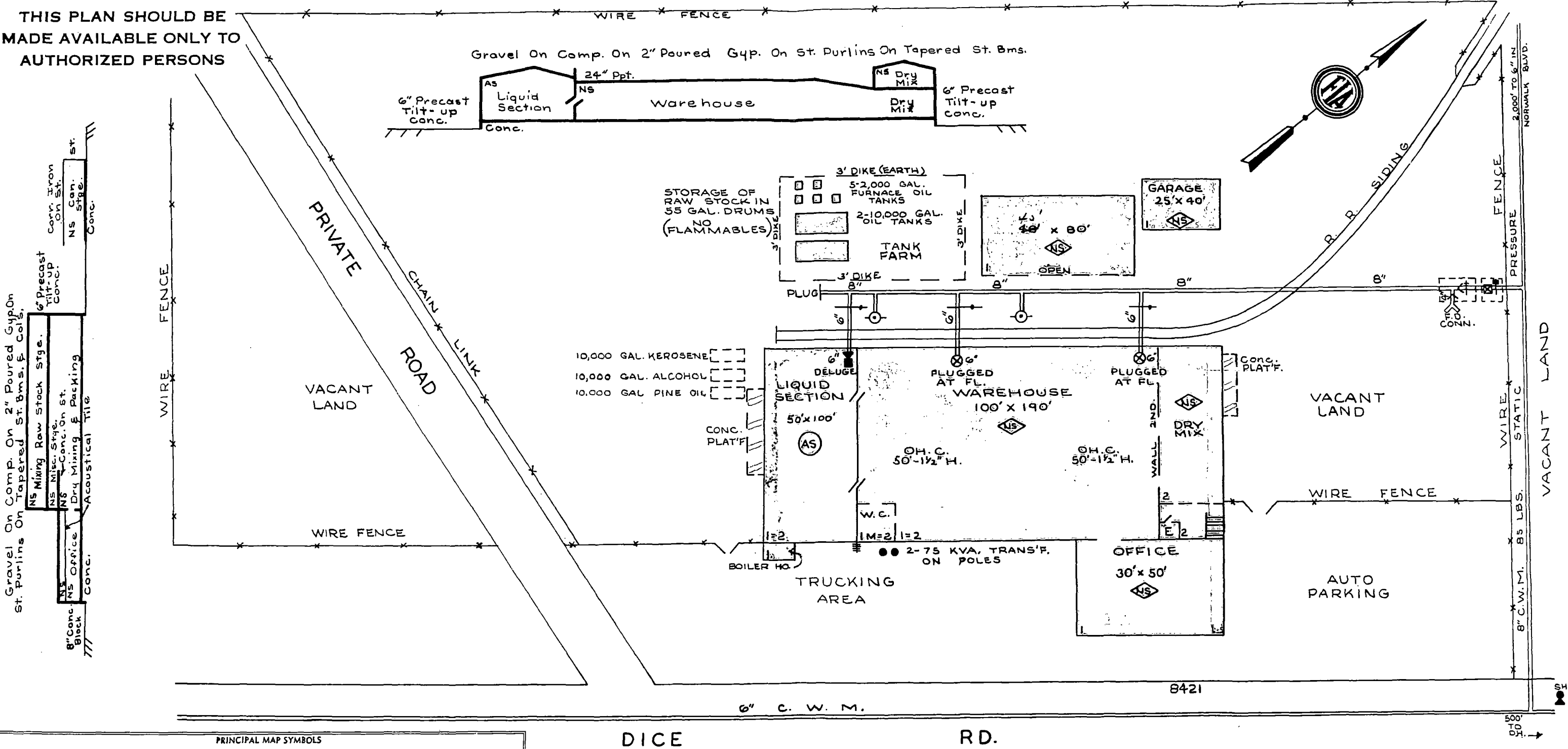
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Exhibit A

CONFIDENTIAL

THIS PLAN SHOULD BE
MADE AVAILABLE ONLY TO
AUTHORIZED PERSONS

P-3739-W



PRINCIPAL MAP SYMBOLS

- | | | |
|--|--|---|
| <p>FIRE-RESISTIVE, PROTECTED STEEL—
COLOR BROWN.</p> <p>MASONRY OR CONCRETE WALLS, UNPROTECTED STEEL INTERIOR AND ROOF, NO WOOD—
COLOR GRAY WITH BROWN MARGIN.</p> <p>FIRE-RESISTIVE EXCEPT WOOD ROOF, TWO OR MORE STORIES—
COLOR BROWN WITH YELLOW CENTER.</p> <p>CONCRETE, STONE, CONCRETE OR CINDER BLOCK WALLS, COMBUSTIBLE ROOF & INTERIOR—
COLOR BLUE.</p> <p>1-2 TO NUMBER OF STORIES SHOWN IN LOWER LEFT HAND CORNER.</p> <p>WINDOW, (SHOWN ONLY IN MASONRY WALL).</p> <p>FIRE DOOR, FLOOR INDICATED.</p> <p>CHIMNEY, BRICK & HEIGHT INDICATED.</p> <p>INDICATES SPRINKLERED BUILDING.</p> <p>INDICATES UNSPRINKLERED BUILDING.</p> <p>MAIN WATER PIPES FOR FIRE PROTECTION.</p> <p>MAIN WATER PIPES FOR FIRE PROTECTION, (UNDER BUILDINGS).</p> <p>VALVE IN PIT, (PIT INDICATED BY BROKEN CIRCLE).</p> <p>CHECK VALVE, INDICATES DIRECTION OF FLOW.</p> <p>WATER FLOW ALARM VALVE.</p> <p>FIRE DEPARTMENT CONNECTION.</p> <p>PRIVATE HYDRANT, (FROSTPROOF).</p> <p>PUBLIC HYDRANT, (D. H. INDICATES DOUBLE HYDRANT WITH PUMPER CONNECTION).</p> | <p>BRICK OR HOLLOW TILE WALLS, COMBUSTIBLE ROOF & INTERIOR—
COLOR RED.</p> <p>NON-COMBUSTIBLE WALLS & ROOF—
COLOR GRAY.</p> <p>WOOD IRON-CLAD OR WOOD SKELETON IRON-CLAD—
COLOR YELLOW WITH GRAY MARGIN.</p> <p>WOOD FRAME OR WOOD STUCCOED—
COLOR YELLOW.</p> <p>FIRE WALLS.</p> <p>OTHER WALLS.</p> <p>PARAPETED WALL.</p> <p>ELEVATOR.</p> <p>STAIRS.</p> <p>BOILER.</p> <p>POST INDICATOR VALVE.</p> <p>KEY VALVE.</p> <p>DRY PIPE VALVE.</p> <p>SPRINKLER RISER.</p> <p>ALARM CHECK VALVE.</p> <p>SUCTION PIPE.</p> <p>HOSE CONNECTION.</p> | <p>FIRE ALARM BOX.</p> <p>WATCHMAN'S CLOCK STATION.</p> <p>SECTION</p> <p>PARAPETED WALL.</p> <p>CONCRETE ROOF INDICATED BY HEAVY LINE.</p> <p>WOOD FLOOR, (PLANK ON TIMBER).</p> <p>WOOD FLOOR, (OPEN JOIST).</p> <p>SHEATHED FLOOR.</p> <p>WINDOW.</p> <p>AUTOMATIC SPRINKLER IN ROOM.</p> <p>NO SPRINKLER IN ROOM.</p> <p>EARTH.</p> |
|--|--|---|

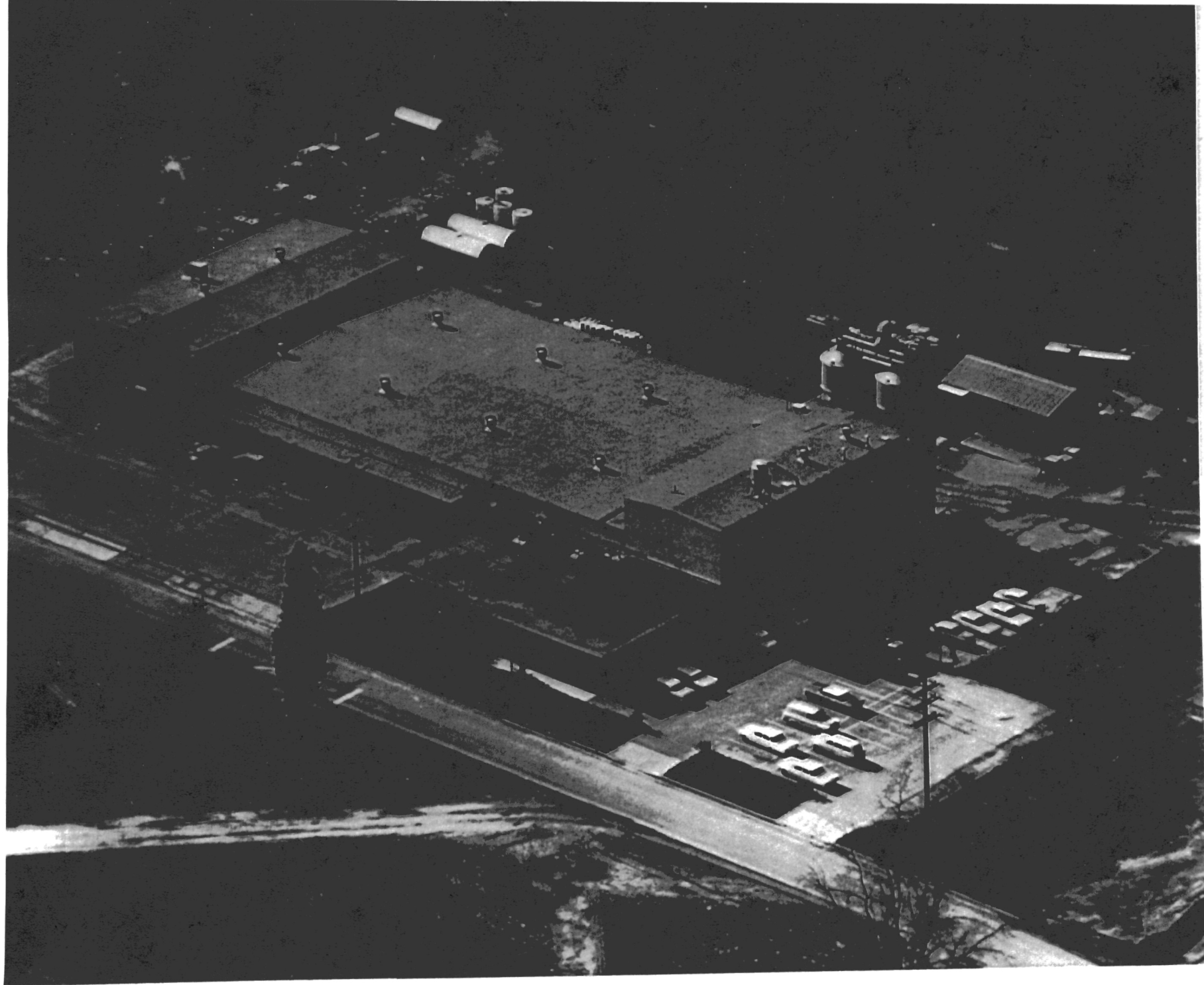
WYANDOTTE CHEMICALS CORPORATION
LOS NIETOS, CALIFORNIA

SCALE 1 INCH=50 FEET

BASF Dice Rd 001

FACTORY INSURANCE ASSOCIATION
WESTERN REGIONAL OFFICE
CHICAGO, ILL.

MARCH 21 ST, 1963



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Exhibit B

**BASF Corporation's Responses to EPA Region 9
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Exhibit C

Interoffice

BASF

Date March 31, 1993
To P. Arvidson
From/Unit K. Koneval
Location/Extension 8 Campus Drive/4559
Subject **SUPERFUND FILE**
Copies D. Webster (w/encl)

Enclosed herein are the original copies of BASF Wyandotte Corporation's filing under Public Law 96-510, Superfund (Section 103 (c) of the Comprehensive Environmental Response and Liability Act of 1980). I recommend saving these forever and keeping them in the General Section of the Special Projects files.

Ken/tn

Ken

KCK:tn

Enclosure

SUPERFUND REPORT

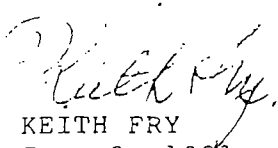
We have completed the review of presently and formerly owned sites and determined which sites must be reported to EPA under the Superfund [(Section 103(c) of the Comprehensive Environmental Response and Liability Act of 1980)]. This report was filed on June 9, 1981. The sites reported were:

Presently Owned

Formerly Owned

Santa Fe Springs, California

The report, complete with back-up information, will be given to Bob Thoma for his reference. Each General Manager and Site Manager will be provided a copy of the information relating to his business or plant for the record. Each site reviewed the submission before being mailed to EPA.


KEITH FRY
June 9, 1981

Santa Fe Springs, Cal. *

Wyandotte Chemicals Corporation purchased Pacific Chemical, a privately owned compounder of cleaning chemicals. This operation was situated in a leased building in Los Angeles, and was moved to Santa Fe Springs on June 12, 1950.

During the period of 1953 to 1974, approximately 15 shallow wells (40 ft.) were used on the Santa Fe Springs property for disposal. Waste solutions containing sodium hydroxide, sodium carbonate, phosphoric acid, and various vessel washings were injected into these wells. Operation occurred 5 days/week and volume only amounted to an average of 200 gal/day. Wells in 1974 were sealed by paving over with a parking lot. On site treatment consisted of neutralization of process waste water. Small quantities of hazardous wastes were occasionally at the plant for off-site disposal.

This plant was sold to Diversey Wyandotte Corporation in 1979. (Data provided by R. Morrow, Plant Manager).

BASF Wyandotte Corporation
Santa Fe Springs, California

BWC should conclude, based on personnel recollection and an examination of reasonably available records that this site may pose a slight hazard to the environment. It is unlikely to warrant or require government attention or response. However, due to the corrosive nature of some of the wastes disposed on site, this location is subject to section 103(c) notification under Superfund.

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Exhibit D

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name BASF Wyandotte Corporation
Street P. O. Box 181
City Parsippany, State N.J. Zip Code 07054

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site (Former) BASF Wyandotte Corporation
Street _____
City Santa Fe Springs County Los Angeles State CA Zip Code _____

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Kraemer, Wm., Mgr., Corp. Env. Protection
Phone (201) 263-5310

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) 1953 To (Year) 1974

E Waste Type

During the period of 1953 to 1974 approximately 15 shallow wells (40 ft.) were used on the Santa Fe Springs property for disposal. Waste solutions containing sodium hydroxide, sodium carbonate, phosphoric acid, and various vessel washings were injected into these wells. Some neutralization would have taken place in the underground. Operation occurred 5 days/week and volume only amounted to an average of 200 gal/day. Wells in 1974 were sealed by paving over with a parking lot.

This plant was sold to Diversey Wyandotte Corporation in 1979.